

1 WEIL, GOTSHAL & MANGES LLP
2 Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
3 Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
4 Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
5 767 Fifth Avenue New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

7 KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

13 *Attorneys for Debtors and Reorganized Debtors*

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15 **UNITED STATES BANKRUPTCY COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 **In re:**

19 **PG&E CORPORATION,**

20 **- and -**

21 **PACIFIC GAS AND ELECTRIC**
22 **COMPANY,**

23 **Debtors.**

- 24 Affects PG&E Corporation
 Affects Pacific Gas and Electric
Company
 Affects both Debtors

25 * *All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

26 Bankruptcy Case No. 19-30088 (DM)

27 Chapter 11

28 (Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO NINETEENTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (DUPLICATE CLAIMS) AND
REQUEST FOR ORDER BY DEFAULT AS
TO UNOPPOSED OBJECTIONS**

[Re: Dkt. No. 11743]

**Resolving Objections Set for Hearing
February 2, 2022 at 10:00 a.m. (Pacific Time)**

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that the Court enter an order by default on the *Reorganized Debtors’ Nineteenth Securities Claims Omnibus Objection (Duplicate Claims)* [Docket No. 11743] (the “**Nineteenth Securities Claims Omnibus Objection**”).

**RELIEF REQUESTED IN THE
NINETEENTH SECURITIES CLAIMS OMNIBUS OBJECTION**

The Nineteenth Securities Claims Omnibus Objection seeks to disallow and expunge certain proofs of claim that duplicate others submitted in the Chapter 11 Cases. The claims subject to the Nineteenth Securities Claims Omnibus Objection are listed in **Exhibit 1** to that Objection.

NOTICE AND SERVICE

The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors' Nineteenth Securities Claims Omnibus Objection (Duplicate Claims)* [Docket No. 11745] (the “**Notice of Hearing**”). The Nineteenth Securities Claims Omnibus Objection was supported by the *Declaration of Justin R. Hughes in Support of Reorganized Debtors' Nineteenth Securities Claims Omnibus Objection (Duplicate Claims)* [Docket No. 11744] (the “**Hughes Declaration**”). The Nineteenth Securities Claims Omnibus Objection, the Notice of Hearing, and the Hughes Declaration were served as described in the *Certificate of Service* of Sonia Akter, filed on January 4, 2022 [Docket No. 11790] (the “**Certificate of Service**”). As further described in the Certificate of Service, on December 22, 2021, each holder of a claim listed on **Exhibit 1** to the Nineteenth Securities Claims Omnibus Objection received a notice including the claim number, debtor, claim amount, and the basis for the Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and expunged.

1 The deadline to file responses or oppositions to the Nineteenth Securities Claims Omnibus
2 Objection has passed. The Reorganized Debtors have received the following responses:

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Kingfishers L.P.	98962	The Reorganized Debtors have discussed the informal response with counsel for claimant and claimant does not oppose the Nineteenth Securities Claim Omnibus Objection or the disallowance and expungement of Claim No. 98962. Both claimant and the Reorganized Debtors reserve all rights with respect to Claim No. 98960.

9 **DECLARATION OF NO OPPOSITION RECEIVED**

10 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

- 11 1. I am a member of the law firm of Weil, Gotshal & Manges LLP (“Weil”), counsel for
12 the Reorganized Debtors.
- 13 2. The Court’s docket in the Chapter 11 Cases has been reviewed and Weil has determined
14 that no responses have been filed with respect to the Nineteenth Securities Claims Omnibus Objection
15 except as described herein.

17 WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and
18 expunging the proofs of claim listed in the column headed “Claim to be Disallowed and Expunged” in
19 Exhibit A to this Request, which listed claims identical to those in Exhibit 1 to the Nineteenth Securities
20 Claims Omnibus Objection, except as otherwise discussed above.

21 Dated January 26, 2022

22 **WEIL, GOTSHAL & MANGES LLP**

23 **KELLER BENVENUTTI KIM LLP**

25 By: /s/ Richard W. Slack

26 Richard W. Slack

28 *Attorneys for Debtors and Reorganized Debtors*